

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ASTENJOHNSON, INC.,

Plaintiff,

v.

COLUMBIA CASUALTY COMPANY, et al.

Defendants.

Civil Action No. 03-1552

PLAINTIFF'S AMENDED TRIAL EXHIBITS¹

ASTENJOHNSON INC. V. COLUMBIA CASUALTY COMPANY, ET AL.

EX. NO.	BATES NOS.	DATE	DESCRIPTION
1	AJ000220-AJ000229	04/01/79- 04/01/80	American Insurance Company Policy No. XLB 13307 30 for the policy period April 1, 1979 to April 1, 1980.
2	AJ000232-AJ000238	04/01/80- 04/01/81	American Insurance Company Policy No. XLB 142 69 78 for the policy period April 1, 1980 to April 1, 1981.
3	AJ000260-AJ000272	04/01/81- 04/01/82	American Insurance Company Policy No. XLB 146 84 46 for the policy period April 1, 1981 to April 1, 1982.
4	AJ000313-AJ000318	04/01/82- 04/01/83	American Insurance Company Policy No. XLB 152 13 08 for the policy period April 1, 1982 to October 1, 1983.
5	AJ000330-AJ000340	04/01/82- 04/01/83	American Insurance Company Policy No. XLX 148 11 21 for the policy period April 1, 1982 to October 1, 1983.
6	CCC04044-CCC-04055	04/01/81- 04/01/82	Columbia Casualty Policy No. CCP 186 60 01 for the policy period from April 1, 1981 to April 1, 1982.
7	AJ000274-AJ000277, & AJ000281-AJ000286	04/01/81- 04/01/82	Columbia Casualty Excess Umbrella Liability Policy No. RDX 417 02 07 for the policy period from April 1, 1981 to April 1, 1982.
8	CCC04075-CCC04091, & CCC04093, CCC04095-CCC04096	04/01/82- 04/01/83	Columbia Casualty Policy No. CCP 186 61 10 for the policy period from April 1, 1982 to October 1, 1983.
9	AJ000320-AJ000328	04/01/82- 04/01/83	Columbia Casualty Excess Umbrella Liability Policy No. RDX 917 61 20 for the policy period from April 1, 1982 to October 1, 1983.
10	AJ2009975-AJ2009991	11/79	<u>Hill v. Johns-Manville Corp.</u> , Nov. Term 1979, No. 2704.

¹

AstenJohnson, Inc. reserves its right to incorporate exhibits identified by the Defendants.

EX. NO.	BATES NOS.	DATE	DESCRIPTION
11	AMER02918-AMER02920	undated	Internal American Insurance Company Memo relating to AJN.
12	AMER02822	02/08/80	Internal Memorandum from W. Kathrins to Mr. Frazier
13	AMER02648	07/18/83	Internal Memorandum from John Sandberg to Kirk Frazier re Asten Hill cases.
14	AMER02738-AMER02740	03/04/83	Internal Memorandum from J. Davison to Mr. Frazier .
15	AMER02732	04/26/83 & 06/09/83	Internal File Notes.
16	AMER02813	10/19/83	Internal Memorandum from John Sandberg to Karen Turnbaugh re all cases filed against Asten Hill.
17	AMER02711-AMER02714	07/14/86	Letter from Karl Moldrem to G.T. Chapman and Eileen Mahoney.
18	AMER02698-AMER02704	07/14/86	Letter from Karl Moldrem to G.T. Chapman and Eileen Mahoney.
19	AMER03054-AMER03056	07/14/86	Letter from Karl Moldrem to G.T. Chapman and Eileen Mahoney.
20	AMER03052-AMER03053	07/15/86	Internal Memorandum from Karl Moldrem to file re Asten Hill bodily injury file.
21	AMER02722-AMER02724	05/19/88	Letter from Karl Moldrem to Eileen Mahoney re pending asbestos litigation.
22	AMER03046-AMER03048	09/12/88	Letter from Susan Gorlick to Eileen Mahoney re pending asbestos litigation.
23	AMER03076-AMER03078	09/10/88	Letter from David E. Forsman to Eileen Mahoney, re notice of pending asbestos litigation.
24	AME 03083		Excess Asbestos Claims Tracking Instruction Sheet.
25	AME 00322		Asbestos Case Report – Update as of 02/98.
26	AJ007539-AJ007544	03/01/02	Letter from James A. Young, Esq. to Robert Solano.
27	AMER01282-AMER01284	08/27/02	E-mail from Robert Solano to James Young, Esq. re policy language questions and prior e-mail exchange.
28	AMER02813	10/19/83	Letter from Karen Turnbaugh to John Sandberg re: cases pending in Asten-Hill.
29	AMER03098-AMER03145	02/29/84	Letter from Eileen Mahoney to John R. Sandberg re: Asten-Hill asbestos cases.
30	AJ004929-AJ004939	08/24/84	Letter from Eileen Mahoney to Nancy Roach re: latest letters sent to Asten-Hill.
31	AMER03045	09/21/88	Letter from David E. Forsman to Eileen Mahoney re: matter being handled by Environmental Claims Facility.
32	AMER003082	04/03/91	Letter from David E. Forsman to Eileen Mahoney re: claim being handled at Fireman's Fund Environmental Claims Facility.
33	AMER03372	04/18/03	E-mail from Robert S. Solano to Catherine Zaryczny re: CNA primary policies.
34		09/10/73	Copy of Decision: <u>Borel v. Fiberboard Paper Products Corp.</u> , 493 F.2d 1076 (5 th Cir. 1973).
35	AJ2013085-AJ2013087	11/10/84	Memorandum from Don to Dietrich re: Biological Effects of Asbestosis.
36	FFSC004302	11/21/78	Fireman's Fund – Inter-office Memo to Mr. Barton from Mr. Russo re: Cumulative Trauma Cases Asbestosis Medical Seminar.

EX. NO.	BATES NOS.	DATE	DESCRIPTION
37	FFSC004318	08/07/79	Fireman's Fund – Inter-office Memo to Mr. Barton from Mr. Russo re: Cumulative Trauma, Various Asbestos Manufacturers.
38	FFSG000227-FFSG000228	09/12/79	Fireman's Fund – Inter-office Memo, re: File Analysis Cumulative Trauma.
39	FFSC004304-FFSC004305	11/29/79	Fireman's Fund – Inter-office Memo, re: Cumulative Trauma – Asbestos.
40	FFSD000142-FFSD000242	01/81	Fireman's Fund – Cumulative Trauma Reference Guide for Claims, Loss Control and Underwriting, Prepared by Environmental Sciences Unit H.O. Loss Control.
41	FFSD000008-FFSD000080	02/01	Fireman's Fund – Cumulative Trauma Reference Guide for Claims, Loss Control And Underwriting, prepared by Environmental Sciences unit H.O. Loss Control.
42	FFSD000324-FFSD000529	undated	Fireman's Fund Insurance Companies Cumulative Trauma Reference Guide for Claims, Loss Control and Underwriting, Prepared by Special Services Unit H.O. Loss Control.
43	FFSD000920-FFSD000961	04/05/82	Fireman's Fund -- Inter-office Memo to Commercial Lines Managers from Sandra Bose re: material for the Underwriters Cumulative Trauma Reference Guide Educational Meeting, with attached copy of Guide.
44	FFSG000427-FFSG000434	04/27/81	Fireman's Fund – Memo re: Cumulative Trauma-Widespread Use of Chemicals Excess & Special Risk, Casualty Underwriting.
45	FFSD000915-FFSD000918	1982	Fireman's Fund – Internal Memorandum Relating to Cumulative Trauma Reference Guide Educational Meeting.
46	FFSA005070-FFSA005205	08/02	Fireman's Fund – Managing Branch Cumulative Trauma Claims, August 1982 Cumulative Trauma Seminar.
47	FFSA004980-FFSA004988	05/82	Fireman's Fund – Managing Branch Cumulative Trauma Claims, May 1982 Cumulative Trauma Seminar.
48	FFSD000890-FFSD000907	undated	Fireman's Fund -- Cumulative Trauma Reference Guide Educational Meeting – The Role of the Underwriter.
49	FFSA005794-FFSA005822	04/83	Fireman's Fund – Home Office Cumulative Trauma Claims, April 1983.
50	FFSB000858-FFSB000905	06/15/83	Fireman's Fund – Inter-office Memo to Claims Managers, Nationwide from Mr. Jordan, H.O. Claims re: Cumulative Trauma Standard Operating Procedures.
51	FFSA005681-FFSA005724	undated	Fireman's Fund – Cumulative Trauma Operating Procedures.
52	FFSC001486-FFSC001488	11/20/78	Fireman's Fund – Manual of Procedures, Commercial Lines Department, [Underwriting] Liaison with Claims Department.
53	FFSC004363	undated	Fireman's Fund – The Line Department Function-Home Office Chart Branch Administration Executive & Branch Administration Charts.
54	FFSC04330-FFSC04334	undated	Fireman's Fund – Asbestos Claims Management Information.

EX. NO.	BATES NOS.	DATE	DESCRIPTION
55	FFSC004307	01/24/79	Fireman's Fund – Inter-office Memo to Mr. Cole from D.M. Barton re: Asbestos.
56	FFSC004313-FFSC004314	02/12/19[] [illegible],	Fireman's Fund – Inter-office Memo to Mr. Conley from Mr. Cole re: Asbestos Related Claims Handling.
57	FFSG000656-FFSG000725	08/01/79	Fireman's Fund – Inter office memo to Mr. Buell from Mr. Black re: Educational Meeting on Asbestos-Related Diseases.
58	FFSG001186-FFSG001351	11/14/79	Fireman's Fund -- Home Office Claims Bulletin A-393-B to Branch Claims Managers Nationwide from Mr. Russo re: Cumulative Trauma Educational Meeting Asbestos Claims Guide.
59	FFSG000911-FFSG001038	undated	Fireman's Fund Insurance Companies Asbestos Claims Guide.
60	FFSG001155-FFSG001185	01/80	Fireman's Fund Insurance Companies Training & Communications Educational Meeting "Asbestos Claims & Related Issues & Introducing: The Asbestos Claims Guide".
61	FFSA002203-FFSA002249	01/80	Educational Meeting, Asbestos Claims & Related Issues & Introducing The Asbestos Claims Guide.
62	FFSA04931-FFSA04938	08/29/80	Asbestos Liability: An Issue of Unprecedented Loss Potential, Lehman Brothers Kuhn Loeb Research.
63	FFSA008925	03/21/80	Fireman's Fund – Inter-office Memo, re: Asbestos Health Hazards Compensation Act of 1979.
64	FFSA008923	03/26/80	Fireman's Fund – Inter-office Memo, re: Asbestos Health Hazards Compensation Act of 1979.
65	FFSA008913-FFSA008919		Fireman's Fund – Inter-office Memo, re: Asbestos Health Hazards Compensation Act of 1979.
66	FFSA008921		Fireman's Fund – Inter-office Memo, re: Asbestos Health Hazards Compensation Act of 1979.
67	FFSG001091-FFSG001096		Fireman's Fund – Inter-office Memo, Workers' Compensation Asbestos-Related Benefits.
68	FFSD001523-FFSD001551	07/17/79	Fireman's Fund, Inter-office Memo, H.O. Claims Department Bulletin No. C-10, to: Claims Managers Nationwide, July 17, 1979, re: Workers' Compensation Asbestos-Related Benefits.
69	FFSA04510	08/29/80	Fireman's Fund, Inter-office Memorandum between Mr. Russo and Mr. Buell, re: Cumulative Trauma Record Retention and Retrieval Requirements.
70	FFSA004485-FFSA004509	12/10/81	Fireman's Fund – Cumulative Trauma Records Retention, December 10, 1981, Memorandum and Final Report.
71	FFSA004476	08/24/82	Fireman's Fund – Inter-office Memo to the Board of Management from Mr. Meenaghan re: Cumulative Trauma Litigation-Document Retention.
72		02/24/80	Article re: concerns in the workplace over prolonged exposure to asbestos by Globe staff member, The Boston Globe.
73		12/08/80	Walter Pincus, Asbestos Coming Under Massive Attack by Three Regulatory Agencies, The Washington Post.
74		07/31/82	Randolph E. Bucklin, Steel Firm Facing 12,000 Asbestos Lawsuits, Files for Bankruptcy, The Washington Post.
75		11/22/83	Stuart Auerbach, Manville Files New Plan on Debt Claims, The Washington Post, November 22, 1983.

EX. NO.	BATES NOS.	DATE	DESCRIPTION
76		1969	Experimental Pneumoconiosis, S.H. Zaidi-Director Industrial Toxicology Research Center, Lucknow, India, Johns Hopkins Press, Baltimore Md.
77		09/78	About Asbestos - U.S. Department of Health Education and Welfare: HEW Publication No. 78-10320.
78			Irving J. Selikoff and Douglas H. K. Lee, Asbestos and Disease Academic Press (1978).
79		1977-1978	David B. Thomas, Lung Cancer and Ambient Air Pollution, 8 Environmental Law 701.
80			W. Raymond Parkes, M.D, Occupational Lung Disorders, MRCP, DIH, Butterworths (1 st ed. 1974) (2d ed. 1982).
81			Clinical Aspects of Inhaled Particles, edited by D.C. F. Muir, Ph.D. MRCP (undated) F.A Davis Co., Philadelphia, Pa.
82		1973	"Asbestosis and Mesothelioma Benefits Act, H.R. 6906, 93d Cong. § 1 (1973).
83			The Asbestos: Crisis-Yesterday, Today & Tomorrow, Council on Compensation Insurance (undated).
84		10/75	Engineering and Safety Service Chemical Hazards Bulletin: Asbestos, American Insurance Association, N.Y. October 1975.
85		10/79	Product Liability Insurance: Underwriting, Rates, Reserves, Business Cycles, American Insurance Association.
86		1978-1979	Comments Asbestos Litigation: The Dust Has Yet to Settle, 7 Fordham Urb. L. J. 55.
87		05/12/81	Asbestos...A social Problem, A Position Paper Prepared by The Environmental Issues Task Force, Commercial Union Insurance Companies.
88		01/82	The Economic Consequences of Asbestos Related Disease by Paul W. MacAvoy, in association with J. Karr and P. Wilson, Working paper #27, Working Paper Series C- Research Program in Government Business Relations.
89		03/82	Asbestos Litigation – Insurance Issues- Liability-Damages, March 1-2, 1982 in New York City, March 22-23, 1982 in Chicago.
90		05/20/82-05/22/82	Industrywide Litigation -- The Medical Insurance Aspects of Asbestos Litigation, May 20-22, 1982, sponsored by Defense Research Institute.
91		1984	Asbestos: Medical and Legal Aspects, by Barry I. Castleman with a contribution by Stephan L. Berger, Law and Business Insurance, Harcourt Brace Jovanovich.
92		1980	Asbestos Exclusions of Granite State Insurance Company.
93		1980	Asbestos Exclusions of California Union Insurance Company.
94		1981	Asbestos Exclusions of Potomac Insurance Company.
95		1982	Asbestos Exclusions of Geico Insurance Company.
96	AJ005786-AJ005797	06/15/81-04/01/82	Asten-Hill, Inc.-Fireman's Fund, Canadian 81-82 policy. Excess Policy.
97	AJ005887-AJ005906	04/01/81-04/01/82	Asten-Hill, Inc.-Fireman's Fund, Canadian 81-82 policy. Excess Policy.

EX. NO.	BATES NOS.	DATE	DESCRIPTION
98	AJ005798-AJ005810	04/01/82-04/01/83	Asten-Hill, Inc.-Fireman's Fund, Canadian 82-83 policy. Excess Policy.
99			Exhibits to Plaintiff's Memorandum of Law in Support of Partial Summary Judgment Against Lloyd's in <u>Asarco Incorporated v. American Home Insurance Company et al.</u> , Cause NO:01-2680-D, 105 th Judicial District of Nueces County Texas.;
100		1995	1995 Casualty Loss Reserve Seminar 3C Measurement of Asbestos Bodily Injury Liabilities by Susan L. Cross, Consulting Actuary and John P. Doucette, Consulting Actuary, Tillinghast Towers Perrin.
101		02/23/05	Old Insurance Policies May Be as Valuable as Stock or Other Hand Assets by James Dorion Marsh Risk Consulting- The Risk Report.
102	AJ007507-AJ007508	11/02/01	Letter from James Nagy to Bradley Mortenson, Esq. re notice of impending asbestos litigation.
103	AJ001635-AJ001655	01/14/02	Letter from James Nagy to Bradley Mortenson, Esq.
104	CCC03994-CCC03997	10/15/02	Letter from Bradley J. Mortensen to Alfreda Phillips re: complaints filed against Asten in Texas & Ohio.
105	CCC03985-CCC03989	03/15/02	Letter from James A. Young to James I. Nagy re: position of CNA Columbia.
106	CCC00162-CCC00167	06/20/02	Letter from Eileen King Bower to James A. Young re: <u>McCarthy v. Acands.</u>
107			CNA agent web page.
108			American agent web page.
109	CCC01042-CCC01043	04/05/82	Binders signed by DVUA and issued on behalf of Columbia.
110	CCC01910	04/16/82	Internal Columbia document relating to AJN Columbia Policies-loss control survey.
119		09/20/02	Letter from Misty Sonnier to Hon. Johnny Appelman re: <u>Daniels v. Pittsburgh</u> and enclosed copy of Plaintiff's One-Hundred and Twenty-Sixth Amended Original Petition.
120		08/13/03	Letter from Nicole A. Lawton to R. Mark Willingham re: Original and Amended Petition in Texas cases.
121	AMER00403		Inactive Records Retrieval form.
122	AMER00396-AMER00405	1980-1981	1. Redacted pages from American Insurance Company Policy No. XLB 142 6978, policy period April 1, 1980 to April 1, 1981.
123	AMER00796		May 1980 notes.
124	AMER04951		Asbestos Exclusion Endorsement Form 175186-3-83.
125	AMER00446	1980	Endorsement #3 – Following Form Products Liability – Policy #XLB1426978.
126			CNA Advertisement.
127	AJM0061-AJM0084		Letter from Maris Hurdman to Asten Group, Inc. Board of Directors re: consolidated balance sheets.
128		1957-1983	AstenJohnson, Inc. coverage chart.

EX. NO.	BATES NOS.	DATE	DESCRIPTION
129	CCC04273-CCC04294	1980-1981	Redacted other policy documents.
130	AJ2 011013-AJ2 011072		Amended Complaint In Equity For Declaratory And Injunctive Relief
131	AJ002350	09/30/80	Memorandum - Argonaut Insurance Company from John A. Flynn.
132	CCC01751-CCC01767		Dryer Felts and Fabrics (Asten-Hill Co.).
133	CCC01743-CCC01750	03/04/81	Letter to Dave Sayles from Stanley I. Blaustein (Delaware Valley Underwriting Agency, Inc.) with enclosures.
134	CCC01740	03/16/81	DVUA Correspondence – Attn: S. Blaustein from D. Sayles Re: Asten Group, Inc.
135	CCC01739	03/17/81	DVUA Correspondence – To: Dave Sayles from Stan Blaustein Re: Asten Group.
136	CCC01738	03/19/81	DVUA Correspondence – Attn: S. Blaustein from D. Sayles Re: Asten Group.
137	CCC01736	04/02/81	DVUA Correspondence – Attn: Stan Blaustein from Carmen Valentin Re: Asten Group, Inc.
138	AJ000278-AJ000280	04/01/81	Insurance Binder Form (Agency: Babb, Inc.; Insured: Asten Group, Inc.; Company: Columbia Casualty) and Babb's Policy Form (CAS P4 PHIL 1-74 10000) Excess Liability.
139	AJ0009766-AJ0009767	04/01/81	Babb's Policy Form (CAS P4 PHIL 1-74 10000) Insured: Asten Hill Co. – Excess Liability and Insurance Binder Form .
140	CCC01824	04/02/81	DVUA Binder To: Ms. Gloria DiGregorio, Babb, Inc. No. 368 STB; Issued on Behalf of Columbia Cas. Ins. Co., Stanley I. Blaustein, Asst. V.P.
141	CCC01810	04/15/81	Letter to David Sayles from Stanley I. Blaustein (DVUA) Re: Asten Group, Inc. #CCP 186 6001, #RDX 4170207.
142	CCC01915-CCC01918	03/8/82	Letter to Mr. Mont Zelman (Columbia Cas. Co.) from Kathy O'Hagan (DVUA) Re: Asten Group, Inc. Policy #'s CCP 1866001 & RDX 4170207 with enclosures.
143	CCC01943	04/05/82	DVUA Binder To: Mrs. Gloria D. Forbes (Babb, Inc.) No. 314 KOH; Issued on Behalf of Columbia Cas. Co.
144	AJ000268	04/01/81	Babb, Inc. Policy Form (CAS P4 PHIL 1-74 10000) Insured: Asten Hill Co.; Umbrella Liability Policy; Ins. Co.: American Insurance.
145	CCC00162-CCC00167	06/20/02	Letter to James A. Young, Esq. from Eileen King Bower (Ross, Dixon & Bell, LLP) Re: Insured: Asten Group, Inc.; Policy No. CCP 1866010.
146	AMER00021-AMER00023	03/06/97 04/22/97	Letter to Christine Tershokovec (3/6/97) from David E. Forsman FFIC Claim No. 820-79-504057; Insured: Asten Hill Letter to James Young (4/22/97) from David E. Forsman FFIC Claim No. 820-79-504057 Insured: Asten Hill.
147	AJ009978	09/05/01	Letter to James M. Gibson from Robert Solano (Sr. Litigation Analyst of FFIC) FFIC Claim No. 820-79-54057; Insured Asten-Hill Co; Policies: XLB 1330730; XLB 1426978; XLB 1521308; XLX 1481121.
148	AJ007539-AJ007544	03/01/02	Letter to Mr. Robert Solano (FFIC) from James A. Young and fax cover sheet.
149	CCC01817		Marked-up Asbestosis Exclusion.

EX. NO.	BATES NOS.	DATE	DESCRIPTION
150	FFSC001489-FFSC001492	11/20/78	Binders, Activizations, and Quotations.
151		06/14/05	Letter from Michael Conley, Esq. to Nicole J. Rosenbaum, Esq. re: Hollingsworth deposition.
152		06/14/05	Deposition Transcript of Brian E. Gagan.
153		04/12/05	Deposition Transcript of Guy Hollingsworth.
154		06/17/05	Deposition Transcript of Richard Jordan.
155		03/02/05	Deposition Transcript of Laurence A. Krupnick.
156		02/24/05	Deposition Transcript of Jerry Leddy.
157		04/09/05	Deposition Transcript of Paul Lundberg.
158		03/23/05	Deposition Transcript of Karl Moldrem
159		02/16/05	Deposition Transcript of James Nagy.
160		06/10/05	Deposition Transcript of Victoria Roberts.
161		03/14/05	Deposition transcript of David Sayles.
162		02/23/05	Deposition Transcript of Robert Solano.
163		11/08/05	Deposition Transcript of Charlotte-Ann Zack.
164		02/16/05	Deposition transcript of Carmen Valentin.
165		03/07/05	Deposition Transcript of Morton B. Zelman.
166		03/04/05	Deposition Transcript of Richard L. Crane,
167		04/11/88	Deposition Transcript of David Sayles from Carey Canada.
168		06/28/04	Deposition Transcript of Gloria D. Forbes.
169		02/25/05	Deposition Transcript of Gary F. Ibello.
170		02/09/05	Deposition Transcript of John R. Sandberg.
171		07/14/05	Deposition Transcript of Allan D. Windt.
172			Chart entitled "Dramatic Increase in Plaintiff Suits", figures from 1978-2002.
173			Chart re: information on the Plaintiffs AstenJohnson.
174			Public Information: Asbestos-Related Diseases, "About Asbestos", U. S. Department of Health, Education, and Welfare, HEW Publication No. 78-10320: September 1978.
175			Public Information: Asbestos-Related Diseases, "U.S. Standard: Asbestosis Separate from Mesothelioma, Lung Cancer, Cancers of the Esophagus, Stomach, Colon, and Rectum, U. S. Department of Health, Education, and Welfare, HEW Publication No. 78-10320: September 1978.
199	N/A		<u>Utter v. Asten-Hill Manufacturing Co.</u> , 453 Pa. 401, 309 A.2d 583 (1973).
200	AJ005466-AJ005494	04/11/2000	Letter and enclosed Asbestos Litigation Quarterly Report of March 31, 2000.
201	AJ005591-AJ005624	06/30/2000	Asbestos Litigation Quarterly Report of June 30, 2000.
202	AJ007436-AJ007486	12/31/2002	Asbestos Litigation Quarterly Report of December 31, 2002.
203	N/A		Revised AJN Coverage Chart.
204	N/A	09/19/1980	Defense Research Institute Seminar Materials "Industry Wide Litigation-Asbestos Action Defense Techniques, Sept. 19-20 1980 Las Vegas Nevada"
205	AJ005937-AJ005961		Asten Group Register of Excess Liability Policies

EX. NO.	BATES NOS.	DATE	DESCRIPTION
206	AJ005982-AJ006006		Asten Group Register of Comprehensive and General Liability Policies
207	N/A	11/20/2003	Letter from Ronald Schiller, Esq. to James Young, Esq, dated November 20, 2003.
209	AJN-R00113-115		Excerpts from Lloyd's London, issued to Keene Corporation, policy number 543/50664/77
210	AJN-R00116-118		Excerpts from Aetna Casualty policy issued to Jim Walter Corporation, policy number 23AL204831 SCA
211	AJN-R00119-120		Excerpts from Aetna policy issued to Jim Walter Building Products, policy number 985LG8800060 SCA
212	AJN-R00121-122		Excerpts from Aetna policy issued to Jim Walter Building Products, policy number 985LG8800216 SCA
213	AJN-R00123-124		Excerpts from Aetna Insurance Policy issued to Carey Canada, policy number 985LG8800424 SCA
214	AJN-R00125-126		Excerpts from Aetna policy issued to Carey Canada, policy number 985LG8800604 SCA
215	AJN-R00127-128		Excerpts from Aetna policy issued to Carey Canada, policy number 985LG8800749 SCA
216	AJN-R00129-130		Excerpts from Aetna policy issued to Carey Canada, policy number 985LG8800911 SCA
217	AJN-R00131-132		Declarations & Endorsement #2 from First State policy issued to Pittsburgh Corning, policy no. 926715
218	AJN-R00133-134		Declarations & Endorsement #2 from First State policy issued to H.K. Porter Company, policy no. 926715
219	AJN-R00135-136		Excerpts from Home Insurance policy issued to Armstrong Cork, policy no. HEC 9-63-15-55
220	AJN-R00137-138		Certificate of Excess Insurance and Endorsement #1 from California Union policy issued to Armstrong Cork, policy no. ZCX 00-34-41
221	AJN-R00139-140		Certificate of Excess Insurance and Endorsement #1 from California Union policy issued to Armstrong Cork, policy no. ZCX 00-39-12
222	AJN-R00141-142		Declaration & Exclusion pages from CNA policy issued to H.K. Porter, policy no. CCP 004-75-48-54
223	ASNJ00000729-728		Declaration and Endorsements #s. 4 and 7 to First State policy issued to ASARCO, Inc., policy no. 927956
224	AJN-R00143-144		Declaration and Endorsement #2 to National Union policy issued to Johns-Manville, policy no. 991-03-99

EX. NO.	BATES NOS.	DATE	DESCRIPTION
225	AJN-R00145-146		Declarations Page and Occupational Disease Exclusion to Integrity Insurance Company's Commercial Catastrophe Liability Policy issued to H.K. Porter, policy no. ISX108237
226	ASNJ00002240-255		American Home Assurance policy issued to ASARCO, Inc., policy no. BE1332245
227	AJN-R00147-163		American Home Assurance policy issued to ASARCO, Inc., policy no. BE1332366
228	AJN-R00164-165		Cover Note and Endorsement page for insurance policy no. 614/NTA826 issued by C.E. Heath to ASARCO, Inc.
229	AJN-R00104-105		Cover Note and Endorsement page for insurance policy no. 614/NTB249 issued by C.E. Heath to ASARCO, Inc.
230	AJN-R00106-108		Lloyd's Schedule page and Endorsement #1 for insurance policy issued to ASARCO, Inc., policy no. 614/NTB250
231	ASNJ00000867- ASNJ00000870		Declarations page and Endorsement #1 for insurance policy issued by New England Reinsurance To ASARCO, Inc., policy no. 791864
232	AJN-R00109-110		Declarations page and Endorsement #1 New England Reinsurance policy issued to ASARCO, Inc., policy no. 792014
233	AJN-R00100-112		Declarations page and Endorsement for Twin City Fire policy issued to ASARCO, Inc., policy no. TXS102801
234	AJNR0001-5		Respondent's Appendix – Insurance Brokers Service internal memoranda (Ex. C & G); K. Bergquist letter to J. Kaiser at NUA, dated 05/14/1982 re H.K. Porter (Ex. I); Kaiser telex to K. Bergquist dated 05/18/1982 re H.K. Porter (Ex. J)
235	AJN-R00006-36		Senate Bill 2847 "Asbestos Health Hazards Compensation Act of 1980"
236	AJN-R00037-72		H.R. 5224 "Asbestos Health Hazards Compensation Act of 1980"
237	AJN-R00166-210		Excerpts from CAN policy manual
238	FFSF001300-1316		E&SR Casualty Training Guidelines, December 20, 1978
239	FFP001676		Cumulative Trauma Educational Meeting Asbestos Claims Guide, November 14, 1979
240	FFP001486-91		Workers' Compensation Asbestos-Related Benefits, December 4, 1979, plus attachment: "Asbestos-Related Diseases"

EX. NO.	BATES NOS.	DATE	DESCRIPTION
241	FFP001677		Asbestos Claims & Related Issues, December 17, 1979
242	FFSG000067-139		Educational Meeting re Asbestos Claims & Related Issues & Introducing The Asbestos Claims Guide, Jan '80
243	FFSA008442-43		Occurrence Problem – Definition of Manifestation, June 5, 1980
244	FFSA004943-48		Notes for Presentation at Initial Meeting of Environmental Task Force – July 21, 1980
245	AJN-R00081-82		Memo to Commercial Lines Managers re Liability Insurance Cumulative Trauma; Asbestos-Related Diseases, July 21, 1980
246	FFSG001142-44		Technical Bulletin – Asbestos, February 1973 Revised November 1980
247	FFSA005487-96		Cumulative Trauma Unit – Claims Organizational Analysis, December 1980
248	FFSF000427-433		Cumulative Trauma, 4-27-81
249	FFSA004914-15		Environmental Litigation – An Overview, June 1, 1981
250	FFSA004913		Cumulative Trauma, June 10, 1981
251	FFP001538		Asbestos 1-Day Review
252	FFP001539-43		Asbestos Litigation Meeting, 9-24-81
253	FFP001546		Asbestos-Related Diseases, January 14, 1982
254	FFSA 008343		C.T. Management, February 2, 1982
255	FFSA005029-34		Management of Asbestos Litigation, February 3, 1982
256	FFSA004539		Cumulative Trauma Reference Guide, March 22, 1982
257	FFSA002602 -05		Memo re Injury Codes (Severity Index), April 16, 1982
258	FFSA005363-65		Asbestos Claims Management Draft Release for Underwriting, January 14, 1983
259	FFP001553-55		Proposed Bulletin to Commercial Lines Managers on Asbestos Hazards, January 18, 1983
260	FFSA005484-86		An Overview of C.T. Claims, January 21, 1983
261	AJN-R00096-97		Asbestos – Medical Causation Issues, January 25, 1983
262	AJN-R00093-95		Medical Causation Issues – Areas for Further Consideration, January 25, 1983

EX. NO.	BATES NOS.	DATE	DESCRIPTION
263	AJN-R00098-100		Cumulative Trauma – Distributor of Cumulative Trauma Producing Goods, February 15, 1983
264	FFSA004593		Commercial Lines Underwriting Guide, March 8, 1983
265	FFSA006724-25		Cumulative Trauma Unit, July 17, 1983
266	FFSA006854-57		Letter re Injury Codes, October 17, 1983
267	AJN-R00101		Asbestos/Cumulative Trauma, December 13, 1983
268	AJN-R00102-103		Asbestos Exclusion, July 10, 1986
269	AMER03575-3610		Complaint in AstenJohnson v. Allstate Insurance, et al., E.D. Pa. No. 03-1555, filed March 13, 2003
270	Amer00736-767		Argonaut Insurance Company Policy No. CL86-381-005725, for the policy period April 1, 1980 to April 1, 1981
271	N/A		Policy Number XLX 153 47 73, covering the period March 15, 1983 to March 15, 1984, that Fireman's Fund sold to ASARCO Inc.
272	N/A		Policy Number XLX 153 47 74, covering the period March 15, 1983 to March 15, 1984, that Fireman's Fund sold to ASARCO Inc.
273	N/A		XLX 148 16 98, covering the period March 15, 1982 to March 15, 1983, that Fireman's Fund sold to ASARCO Inc.
AMER-102	AJ2008624–AJ2008658	04/21/1980	Amended Complaint in Trespass – <u>Adgate v. Sun Shipbuilding and Drydock Company, Inc. & Pacor, Inc.</u>
AMER-177	AJ003493–AJ003494	08/30/1979	Letter from L. A. Krupnick to J. A. Young re: defense of case.
AMER-186	AJ005178	10/11/1979	Memorandum re: Asbestos Cases.
AMER-205	AJ2008760–AJ008769	12/28/1979	Letter from J. A. Young to INA re: <u>Adgate v. Asten-Hill.</u>
AMER-221	AJ2006822–AJ2006827	12/28/1979	Letter from P. Petrelius to Allstate Ins. Co. re: third Party Complaint against Asten in <u>Clune v. Johns-Manville.</u>
AMER-224	AJ005135–AJ005143	03/12/1980	Memorandum from G. T. Chapman to DVA re: Asbestos Litigation.
AMER-225	AJ002286–AJ002287	03/13/1980	Letter from J. G. Manta to J. A. Young re: Asbestosis Claims against Asten-Hill.
AMER-277	AJ009469–AJ009471	03/20/1981	Memorandum from R. A. Wilson re: Comprehensive General Liability Insurance.
AMER-296	CCC02193–CCC02194	08/14/1981	Letter from R. Hanebury to C. Valentin re: balance sheet.
AMER-348	AMER02649	06/16/1983	Letter from J. Sandberg to J. A. Young re Various Asbestos Claims -- Asten-Hill.
AMER-402	AMER02695–AMER02697	07/14/1986	Letter from K. Moldrem to E. Mahoney re: pending asbestos litigation.
AMER-403	AMER02698–AMER02704	07/14.1986	Letter from K. Moldrem to G.T. Chapman re: receipt of Asten-Hill Summons and Complaint.
AMER-404	AMER02711–AMER02714	07/14/1986	Letter from K. Moldrem to G.T. Chapman re: referenced policies.
AMER-422	AMER02722–AMER02724	05/19/1988	Letter from K. Moldrem to E. Mahoney re: pending asbestos litigation.

EX. NO.	BATES NOS.	DATE	DESCRIPTION
AMER-437	AMER03076-AMER03078	09/10/1990	Letter from D. E. Forsman to E. Mahoney re: pending asbestos litigation.
AMER-513	AMER03316-AMER03352	06/10/2003	Letter from J. A. Young to C. J. Frandsen; D. Dayton; R. Solano and J. M. Gibson with attached fully executed Claims Handling Agreement.
CCC1	AJ009456-AJ009460	2/81	2/81 Babb Cancellation notice for various Argonaut policies
CCC2	AJ002350	9/30/80	9/30/80 John A. Flynn memo cc'd to G.T. Chapman RE: Argonaut Insurance Co.
CCC-4	CCC-01743-CCC-01750	03/04/1981	Letter from S. Blaustein to D. Sayles re: enclosed application for insurance.
CCC-8	AMER03009-AMER03025	1980	Asten-Hill Action in Equity for Declaratory and Injunctive Relief.
CCC-50	AJ005687-plus article	01/26/2000	Memorandum from J. Gibson to W. A. Finn, T. Hardwick and J. Chapman re: attached New York Times article.
CCC-56	Letter enclosing AJM0025-AJM0092	01/04/05	Letter from M. Conley to R. P. Schiller Esq., S.S. Brown, Esq. and P.A. Peters, Esq. re: additional AstenJohnson Board Minutes and audited financials.
CCC-58	AJ011302-AJ011351	06/10/03	E-mail from J. A. Young to J. M. Gibson re: enclosed "typical" Asten Interrogatories/Answers.
CCC-60	AJ005376-AJ005379	02/13/1985	Letter from E. Mahoney to J. Murphy re: response to letter of February 4, 1985.
CCC-61	AJ002177-AJ002179	09/22/1989	Letter from J. A. Young to G. T. Chapman re: Asbestos Related Actions filed by D. Weinfeld.
CCC-63	Letter enclosing AJM0093-AJM0126	02/24/05	Letter from M. Conley to N. Rosenblum re: copies of additional board related documents
CCC-71	CCC03992-CCC03993	11/02/2001	Letter from J. Nagy to B. Mortensen re: notice of pending asbestos litigation against Aston-Hill.
CCC-72	CCC00198	11/29/01	E-mail from J. Nagy to B. Mortensen re: cost sharing
CCC-73	AJ001635-AJ001655	01/14/2002	Letter from J. Nagy to B. Mortensen re location of Asten Hill policies.
CCC-74	CCC03984-CCC03989	03/15/2002	Fax cover sheet and letter from J. A. Young to J. Nagy and J.M. Gibson re: CNA/Columbia's obligation to provide indemnity benefits.
CCC-76	CCC03961-CCC03962	06/19/2002	Letter from J. A. Young to E. K. Bower re: confirmation of coverage
CCC-105	AJ2009226-AJ2009231	06/21/1979	Letters from L. A. Krupnick to various insurers re: Complaint in Cirone matter.
CCC-106	CCC00160-CCC00161	06/20/2002	Letter from E. K. Bower to J. A. Young re: request for Columbia coverage position.
CCC-117	CCC03929-CCC03932	07/12/2002	Letter from C. E. Cameron to J.A. Young re Columbia's position regarding Asten's request for settlement authorization.
CCC-119	AJ001936-AJ001937	10/30/2002	Letter from E. K. Bower to J. A. Young re: request to conduct an exchange of information.
CCC-120	AJ009801-AJ009802	04/17/2003	Letter from J. A. Young to S. L. Brown re: asbestos-related bodily injury claims.
CCC-141	AJ2011013-AJ2011292	08/13/1980	Asten Group, Inc. t/a Asten-Hill Co. Amended Complaint from <u>Asten v. Argonaut</u> , with exhibits.
CCC-142	AJ2011790-AJ2011810	1980	Plaintiff Asten Group's Answer to Allstate's Motion to Compel Answers to Interrogatory No. 11.
CCC-143	AJ003965-AJ003968	03/24/1994	Letter from J. A. Young to G. T. Chapman re: attached draft letter to Laura Archie.

EX. NO.	BATES NOS.	DATE	DESCRIPTION
CCC-144	AJ003892–AJ003913	N/A	Unexecuted Settlement Agreement between Asten and certain insurers (1980 Coverage Action).
CCC-145	AMER03175–AMER03315	07/27/1983	Letter from E. Mahoney to J. Sandberg re: new comprehensive asbestos case lists and Asten brochure.
CCC-150	AJ003489–AJ003490	06/03/1980	Letter from J. A. Young to A. Crist re: meeting regarding asbestos-related lawsuits
CCC-151	AMER01680–AMER01695	08/14/1980	Letter from G. Hirtz to Commerce & Industry Ins. Co. re: Asten-Hill case lists
CCC-159	AJ002486–AJ002499	01/29/1986	Letter from E. M. Mahoney to N. McCart re: attached copies of notification letters to various insurers from the <u>Caruso v. Raymark</u> matter.
CCC-160	AJ005354 – AJ005361	09/08/1986	Letter from E. M. Mahoney to N. McCart re: attached copies of notification letters to various insurers from the <u>Kalkus v. U. S. Gypsum</u> matter.
CCC-161	AJ002646–AJ002704	10/01/1986	1986 correspondence and discovery re: Shockley case.
CCC-163	AJ002099–AJ005065	10/16/1986	Letters from E. M. Mahoney to various insurers re: <u>Erie v. Asarco</u> case.
CCC-170	AJ009848–AJ009866	02/25/2003	Letter from J. A. Young to J. Lipscomb re: enclosing corrected version of the response to the auditor's letter from J.A. Young to Delotte & Touche, dated 02/24/2003.
CCC-200	N/A	03/13/2003	Complaint – AstenJohnson, Inc. v. Columbia Cas. Co. and American Ins. Co..
CCC-229	AJ000407–AJ000430	04/01/1982-10/01/1983	Columbia Casualty Co. insurance policy # CCP 186 61 10
CCC-269	N/A	08/26/2005	Affidavit of James A. Young.
CCC-271	AJ005411–AJ005423	08/17/1984	Letter from M. Leighton to F. Hayeck re: settlement of attached case list.
CCC-273	CCC03978	04/02/2002	Letter from E. K. Bower to J.A. Young re: search for policies and review materials sent.
CCC-274	CCC00186	05/08/2002	Letter from E. K. Bower to J. A. Young re: forwarding policy and underwriting information.
CCC-275	AJ005144–AJ005155	05/28/1980	Memorandum from G.T. Chapman to D. V. Asten re Asbestosis Litigation and attaching a letter from T. J. Hagan to G.T. Chapman re Asbestosis Claims Asserted Against Asten-Hill, dated 05/19/1980
CCC-276	AJ009867–AJ009883	06/14/2000	Company Policy on behalf of SR International Business Insurance Co. LTD., Policy No. 823KE9902603.
CCC-277	AJ010097–AJ010118	04/01/1981-04/01/1982	CNA Policy No. CCP 1866001